



## Testimony

Before the Subcommittee on Oversight of Government Management, the Federal Workforce, and the District of Columbia, Committee on Homeland Security and Governmental Affairs, U. S. Senate

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For Release on Delivery  
Expected at 2:30 p.m. EDT  
Thursday, June 21, 2012

# PERSONNEL SECURITY CLEARANCES

## Continuing Leadership and Attention Can Enhance Momentum Gained from Reform Effort

Statement of Gene L. Dodaro  
Comptroller General of the United States



| Report Documentation Page  |                                    |                                     | Form Approved<br>OMB No. 0704-0188                        |   |                                 |
|--|------------------------------------|-------------------------------------|---|---|---------------------------------|
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| 1. REPORT DATE<br><b>21 JUN 2012</b>   |                                    | 2. REPORT TYPE                      |   | 3. DATES COVERED<br><b>00-00-2012 to 00-00-2012</b> |                                 |
| 4. TITLE AND SUBTITLE<br><b>Personnel Security Clearances: Continuing Leadership and Attention Can Enhance Momentum Gained from Reform Effort</b>  |                                    |                                     | 5a. CONTRACT NUMBER                                       |   |                                 |
|  |                                    |                                     | 5b. GRANT NUMBER  |   |                                 |
|  |                                    |                                     | 5c. PROGRAM ELEMENT NUMBER                                |   |                                 |
| 6. AUTHOR(S)   |                                    |                                     | 5d. PROJECT NUMBER  |   |                                 |
|  |                                    |                                     | 5e. TASK NUMBER   |   |                                 |
|  |                                    |                                     | 5f. WORK UNIT NUMBER                                      |   |                                 |
| 7. PERFORMING ORGANIZATION NAME(S) AND ADDRESS(ES)<br><b>U.S. Government Accountability Office, 441 G Street NW, Washington, DC, 20548</b>   |                                    |                                     | 8. PERFORMING ORGANIZATION REPORT NUMBER                  |   |                                 |
| 9. SPONSORING/MONITORING AGENCY NAME(S) AND ADDRESS(ES)  |                                    |                                     | 10. SPONSOR/MONITOR'S ACRONYM(S)                          |   |                                 |
|  |                                    |                                     | 11. SPONSOR/MONITOR'S REPORT NUMBER(S)                    |   |                                 |
| 12. DISTRIBUTION/AVAILABILITY STATEMENT<br><b>Approved for public release; distribution unlimited</b>  |                                    |                                     |   |   |                                 |
| 13. SUPPLEMENTARY NOTES  |                                    |                                     |   |   |                                 |
| 14. ABSTRACT   |                                    |                                     |   |   |                                 |
| 15. SUBJECT TERMS  |                                    |                                     |   |   |                                 |
| 16. SECURITY CLASSIFICATION OF:  |                                    |                                     | 17. LIMITATION OF ABSTRACT<br><b>Same as Report (SAR)</b> | 18. NUMBER OF PAGES<br><b>30</b>                    | 19a. NAME OF RESPONSIBLE PERSON |
| a. REPORT<br><b>unclassified</b>   | b. ABSTRACT<br><b>unclassified</b> | c. THIS PAGE<br><b>unclassified</b> |   |   |                                 |



Highlights of [GAO-12-815T](#), a testimony before the Subcommittee on Oversight of Government Management, the Federal Workforce, and the District of Columbia, Committee on Homeland Security and Governmental Affairs, U.S. Senate

## Why GAO Did This Study

As of October 2010, the Office of the Director of National Intelligence reported that 3.9 million federal employees (military and civilians) and contractors hold security clearances. DOD comprises the vast majority of government security clearances. Longstanding backlogs and delays in the security clearance process led GAO to place the DOD's Personnel Security Clearance Program on its high-risk list in 2005. Delays in issuing clearances can result in millions of dollars of additional cost to the federal government and could pose a national security risk. DOD and others have taken steps to address these issues and additional concerns with clearance documentation used to determine eligibility for a clearance. As a result, in 2011, GAO removed the program from its high-risk list.

This testimony addresses (1) the key actions that led GAO to remove DOD's security clearance program from its high-risk list and (2) the additional actions that can enhance the security clearance reform efforts. This statement is based on prior GAO reports and testimonies on DOD's personnel security clearance program and governmentwide suitability and security clearance reform efforts.

View [GAO-12-815T](#). For more information, contact Brenda S. Farrell at (202)512-3604 or [farrellb@gao.gov](mailto:farrellb@gao.gov).

June 21, 2012

## PERSONNEL SECURITY CLEARANCES

### Continuing Leadership and Attention Can Enhance Momentum Gained from Reform Effort

## What GAO Found

Since GAO first identified the Department of Defense's (DOD) Personnel Security Clearance Program as a high-risk area, DOD, in conjunction with Congress and executive agency leadership, took actions that resulted in significant progress toward improving the processing of security clearances. Congress held more than 14 oversight hearings to help oversee key legislation, such as the Intelligence Reform and Terrorism Prevention Act of 2004, which helped focus attention and sustain momentum of the governmentwide reform effort. In addition, the committed and collaborative efforts of DOD, the Office of the Director of National Intelligence (ODNI), Office of Management and Budget (OMB), and Office of Personnel Management (OPM) as leaders of the Suitability and Security Clearance Performance Accountability Council (Performance Accountability Council) demonstrated commitment to and created a vision for the reform effort, which led to significant improvements in the timeliness of processing security clearances. As a result, in 2011, GAO removed DOD's Personnel Security Clearance Program from its high-risk list because of the agency's progress in improving timeliness, development of tools and metrics to assess quality, and commitment to sustaining progress. Specifically, GAO found that DOD met the 60-day statutory timeliness objective for processing initial clearances in fiscal year 2010 by processing 90 percent of its initial clearances in an average of 49 days. In addition, DOD developed two quality tools to evaluate completeness of investigation documentation and agencies' adjudication process regarding the basis for granting security clearances. Moreover, DOD, ODNI, OMB, and OPM developed and are in the process of implementing 15 metrics that assess the timeliness and quality of investigations, adjudications, reciprocity and automation of security clearances.

Even with the significant progress in recent years, sustained leadership attention to the following additional actions, on which GAO has previously reported, can enhance the security clearance reform efforts of executive branch agencies and the Performance Accountability Council:

- Continue to implement, monitor, and update outcome-focused performance measures. The development of tools and metrics to monitor and track quality are positive steps, but full implementation of these tools and measures will enable the executive branch to demonstrate progress in quality improvements and contribute to greater visibility over the clearance process.
- Seek opportunities to enhance efficiencies and manage costs related to the reform effort. Given the current fiscal constraints, identifying long-term funding requirements for the security clearance process is critical for the executive branch to sustain the reform effort. Further, the reform efforts are a venue to facilitate the identification of efficiencies in areas including information technology and investigation and adjudication case management processes.
- Create a sound requirements process for determining which positions require clearances and level of clearances. A sound requirements determination process may help ensure that workload and costs are not higher than necessary by ensuring that clearances are only requested for positions when needed and that the appropriate clearance level is requested.

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Chairman Akaka, Ranking Member Johnson, and Members of the Subcommittee:

Thank you for the opportunity to discuss the removal of the Department of Defense's (DOD) personnel security clearance program from our high-risk list.<sup>1</sup> As you know, we maintain a program to focus attention on government operations that we identify as high risk due to their greater vulnerabilities to fraud, waste, abuse, and mismanagement or the need for transformation to address economy, efficiency, or effectiveness challenges. In the past two decades, the attention of Congress, the agencies, and others to high-risk areas has brought results. Over one-third of the areas previously designated as high-risk have been removed from the list because significant progress was made to address the problems. When legislative, administrative, and agency actions, including those in response to our recommendations, result in significant progress toward resolving a high-risk problem, we remove the high risk designation. In 2011, DOD's personnel security clearance program became the first designated defense area to be removed from our high-risk list. Seven DOD high-risk areas remain on the list. My testimony today will focus on (1) the key actions that led us to remove DOD's personnel security clearance program from our high-risk list, and (2) additional actions that can enhance the governmentwide personnel security clearance reform efforts.

Personnel security clearances allow government and industry personnel to gain access to classified information that, through unauthorized disclosure can in some cases cause exceptionally grave damage to U.S. national security. The 2010 unauthorized leaks of about 500,000 classified documents posted to the Internet related to the wars in Afghanistan and Iraq are examples of the inherent risks involved when granting an individual a security clearance. As you know, there continues to be a high volume of clearances processed. For example, prior to September 11, 2001, we reported that DOD processed about 200,000 clearances annually. For fiscal year 2008, we reported that DOD approved personnel security clearances for approximately 630,000 military, civilian, and industry personnel. In 2010, the Director of National Intelligence reported that there were approximately 3.9 million federal government and contractor employees who held a security clearance.

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<sup>1</sup> GAO, *High-Risk Series: An Update*, [GAO-11-278](#) (Washington, D.C.: February 2007).

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DOD accounts for the vast majority of all initial personnel security clearances, making it a formidable challenge to those responsible for deciding who should be granted a clearance.

Multiple executive-branch agencies are responsible for different phases in the federal government's personnel security clearance process. With respect to DOD's personnel security clearance program, DOD is responsible for determining which military, DOD civilian, and private-industry personnel working on DOD contracts require access to classified information and must apply for a security clearance and undergo an investigation. The Office of Personnel Management (OPM), in turn, conducts these investigations for DOD. OPM investigators—often contractors—use federal investigative standards and OPM internal guidance as criteria for collecting background information on applicants. Federal guidelines require that DOD adjudicators use the information contained in the resulting investigative reports to determine whether an applicant is eligible for a personnel security clearance.

We first placed DOD's personnel security clearance program on our high-risk list in 2005. Some of the problems included (1) delays in completing clearances; (2) incomplete investigative reports from OPM, the agency that reportedly supplies about 90 percent of all federal clearance investigations, including those for DOD; and (3) the granting of some clearances by DOD adjudicators even though required data were missing from the investigative reports used to make such determinations. We also reported that delays in issuing clearances can result in millions of dollars of additional cost to the federal government. Furthermore, during this period the executive branch initiated actions to reform the governmentwide security clearance process.

My testimony is based on our issued reports and testimonies on DOD's personnel security clearance program and governmentwide suitability and security clearance reform efforts.<sup>2</sup> Our reports and testimonies were conducted in accordance with generally accepted government auditing standards.

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<sup>2</sup>See related GAO products at the end of this statement. More information on our scope and methodology is included in each issued report.

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## Leadership Commitment, Improved Timeliness, and Development of Metrics Were Key to Removal of DOD's Security Clearance Program from GAO's High-Risk List

Since we identified DOD's Personnel Security Clearance program as a high-risk area, DOD, in conjunction with Congress and other executive agency leadership, took actions that resulted in significant progress toward resolving problems we identified with the security clearance program. In 2011, we removed DOD's personnel security clearance program from our high-risk list because of the agency's progress in improving timeliness and the development of tools and metrics to assess quality, as well as DOD's commitment to sustaining progress. Importantly, congressional oversight and the committed leadership of the Suitability and Security Clearance Performance Accountability Council (Performance Accountability Council)<sup>3</sup>—which has been responsible for overseeing security clearance reform efforts since 2008—greatly contributed to the progress of DOD and the governmentwide security clearance reform.<sup>4</sup>

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## Top Leadership Demonstrated Commitment and Collaboration in Reforming Security Clearance Process

Leadership in Congress and the executive branch demonstrated commitment to reforming the security clearance process to address longstanding problems associated with the personnel security clearance program. As we have previously noted, top leadership must be committed to organizational transformation.<sup>5</sup> Specifically, leadership must set the direction, pace, and tone and provide a clear, consistent rationale that brings everyone together behind a single mission. Figure 1 illustrates key events related to the Suitability and Personnel Security Clearance Reform Effort.

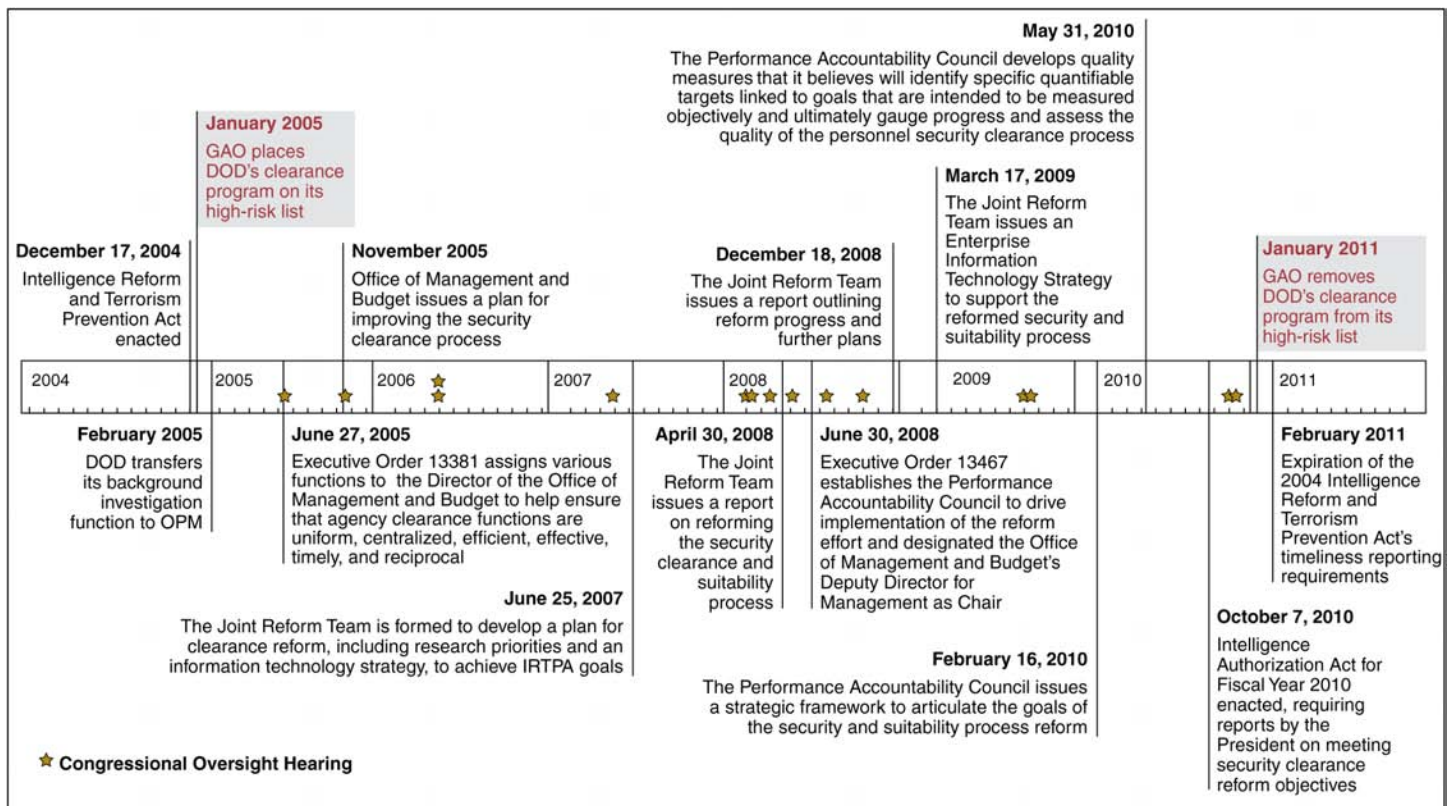
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<sup>3</sup> The Performance Accountability Council is comprised of the Director of National Intelligence as the Security Executive Agent, the Director of OPM as the Suitability Executive Agent, and the Deputy Director for Management, OMB, as the chair with the authority to designate officials from additional agencies to serve as members. The current council includes representatives from the Departments of Defense, Energy, Health and Human Services, Homeland Security, State, Treasury, and Veterans Affairs, and the Federal Bureau of Investigation.

<sup>4</sup> Determinations of suitability for government employment in positions in the competitive service and for career appointment in the Senior Executive Service include consideration of aspects of an individual's character or conduct that may have an effect on the integrity or efficiency of their service.

<sup>5</sup> GAO, *Personnel Security Clearances: Preliminary Observations on Joint Reform Efforts to Improve the Governmentwide Clearance Eligibility Process*, [GAO-08-1050T](#) (Washington, D.C.: July 30, 2008).

**Figure 1: Key Events Related to the Suitability and Personnel Security Clearance Reform Effort**



Source: GAO analysis.

## Congressional Leadership

Congressional legislation and oversight has helped focus attention and sustain momentum to improve the processing of security clearances not only for DOD but governmentwide. The Intelligence Reform and Terrorism Prevention Act of 2004 (IRTPA)<sup>6</sup> established, among other things, milestones for reducing the time to complete initial clearances. We previously identified best practices for agencies to successfully transform

<sup>6</sup>Pub. L. No. 108-458, 118 Stat. 3638 (2004).



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their cultures including among other things, setting implementation goals and a timeline to build momentum and show progress from day one.<sup>7</sup> IRTPA established an interim objective to be met by December 2006 under which DOD and other agencies that adjudicate security clearances were to make a decision on at least 80 percent of initial clearance applications within 120 days, on average. Further, IRTPA called for the executive branch to implement a plan by December 17, 2009, under which, to the extent practical, at least 90 percent of decisions are made on applications for an initial personnel security clearance within 60 days, on average. Additionally, IRTPA required the executive branch to begin providing annual reports to Congress in 2006 on the progress made the preceding year toward meeting IRTPA's objectives for security clearances, including the length of time agencies took to complete the investigations and adjudications—the decision as to whether an individual should be granted eligibility for a clearance.

Congressional oversight through hearings held by this Subcommittee helped highlight the need for security clearance reform. From 2005 to 2010, congressional committees held more than 14 hearings on security clearance reform, with 7 held by this Subcommittee.<sup>8</sup> This subcommittee's oversight helped set the direction for the agencies, including GAO, to work collaboratively on developing metrics in order to address our concerns about the completeness and quality of investigations and adjudications. Many federal program efforts, including those related to personnel security, generally require the effective collaboration of more than one agency. For example, on March 17, 2010, the leaders of the reform effort—the Office of Management and Budget (OMB), OPM, Office of the Director of National Intelligence (ODNI), and DOD—along with GAO, met with this Subcommittee's Chairman and then-Ranking Member to discuss the status of security clearance reform efforts and consult on metrics that could be used to measure progress of

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<sup>7</sup> GAO, *Highlights of a GAO Forum: Mergers and Transformation: Lessons Learned for the Department of Homeland Security and Other Federal Agencies*, [GAO-03-293SP](#) (Washington, D.C.: Nov. 14, 2002), and *Results-Oriented Cultures: Implementation Steps to Assist Mergers and Organizational Transformations*, [GAO-03-669](#) (Washington, D.C.: July 2, 2003).

<sup>8</sup> GAO has testified on security clearance reform before this committee as well as the (1) Subcommittee on Intelligence Community Management, House Permanent Select Committee on Intelligence, (2) the Subcommittee on Government Management, Organization, and Procurement, House Committee on Oversight and Government Reform, and (3) Subcommittee on Readiness, House Committee on Armed Services.



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security clearance reform efforts. After that meeting, OMB, ODNI, DOD, OPM, and GAO provided a memorandum on May 31, 2010 to Chairman Akaka containing a matrix with 15 metrics for assessing the timeliness and quality of investigations, adjudications, reciprocity (an agency's acceptance of a background investigation or clearance determination completed by any authorized investigative or adjudicative agency), and automation.<sup>9</sup> The development of these metrics played a key role in GAO's decision to remove DOD's Personnel Security Clearance program from the high-risk list.

Furthermore, we have noted for many years the central role that the Government Performance and Results Act (GPRA) could play in identifying and fostering improved coordination across related federal program efforts. The GPRA Modernization Act of 2010 (GPRAMA)<sup>10</sup> calls for a more coordinated and crosscutting approach to achieve meaningful results.<sup>11</sup> GPRAMA provides an opportunity for agencies to collect and report more timely and useful performance information on crosscutting programs. This performance information can play an important role in congressional decision making. In fact, Mr. Chairman, we conducted work for you focusing on how Congress can use such information to address challenges facing the government.<sup>12</sup> DOD's personnel security clearance program was one of three case studies we used to illustrate how Congress has used agency performance information in its decision making.

## Executive Branch Leadership

In addition to congressional leadership, multiple administrations, DOD, and key executive agencies demonstrated a commitment and vision to reform the security clearance process. Specifically, after we initially

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<sup>9</sup> We participated in legislative and executive branch discussions on development of these metrics. However, given the need for GAO to remain independent in carrying out its auditing responsibilities of the executive branch, decisions related to performance measures and their effective implementation are fundamentally an executive branch management responsibility.

<sup>10</sup> Pub. L. No. 111-352, 124 Stat. 3886 (2011). GPRAMA amended the Government Performance and Results Act of 1993, Pub. L. No. 103-62, 107 Stat. 285 (1993).

<sup>11</sup> GAO, *Managing for Results: GPRA Modernization Act Implementation Provides Important Opportunities to Address Government Challenges*, [GAO-11-617T](#) (Washington, D.C.: May 10, 2011).

<sup>12</sup> GAO, *Managing for Results: Opportunities for Congress to Address Government Performance Issues*, [GAO-12-215R](#) (Washington, D.C.: Dec. 9, 2011).

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placed the program on our high-risk list, top executive branch leadership put in place an effort to reform the security clearance process. For example, in 2007, DOD and ODNI formed the Joint Security Clearance Process Reform Team, known as the Joint Reform Team, to improve the security clearance process governmentwide.<sup>13</sup> Specifically, they tasked the Joint Reform Team to execute joint reform efforts so that they achieve IRTPA timeliness goals and improve the processes related to granting security clearances.<sup>14</sup> In 2008, the President in a memorandum called for a reform of the security clearance program and subsequently issued an executive order establishing the Performance Accountability Council.<sup>15</sup> Under the executive order, this council is accountable to the President for leading the implementation of reform, including aligning security and suitability processes, holding agencies accountable for implementation, and establishing goals and metrics for progress.

DOD worked with the Joint Reform Team and the Performance Accountability Council to develop a corrective action plan to improve timeliness and demonstrate progress toward reforming the security clearance process. For example,

- DOD's leadership, in conjunction with the Joint Reform Team, developed a plan for reform that continuously evolved to incorporate

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<sup>13</sup> In June 2007, the Director of National Intelligence and Under Secretary of Defense for Intelligence through a memorandum of agreement established The Joint Security Process Reform Team.

<sup>14</sup> The Joint Reform Team continues to work on the reform effort under the Performance Accountability Council by providing progress reports, recommending research priorities, and overseeing the development and implementation of an information technology strategy, among other things. Since its formation, the Joint Reform Team under the Performance Accountability Council: (1) Submitted an initial reform plan to the President on April 30, 2008. The plan proposed a new process for determining clearance eligibility that departs from the current system in a number of ways, including the use of a more sophisticated electronic application, a more flexible investigation process, and the establishment of ongoing evaluation procedures between formal clearance investigations. The report was updated in December 2008 to include an outline of reform progress and further plans. (2) Issued an Enterprise Information Technology Strategy to support the reformed security and suitability process in March 2009. According to the report, the Joint Reform Team is pursuing an approach that leverages existing systems and capabilities, where applicable, and developing new tools where necessary.

<sup>15</sup> Exec. Order No. 13467, *Reforming Processes Related to Suitability for Government Employment, Fitness for Contractor Employees, and Eligibility for Access to Classified National Security Information* (June 30, 2008).

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new goals and address identified issues. To communicate these plans, the Joint Reform Team issued an initial reform plan in April 2008 that presented a new seven-step design intended to streamline the security clearance process, including the use of a more sophisticated electronic application, a more flexible investigation process, and the establishment of ongoing evaluation procedures between formal clearance investigations. The report was updated in December 2008 to include an outline of reform progress and further plans, and in March 2009 the Joint Reform Team issued its Enterprise Information Technology Strategy for the security clearance and suitability reform program. Then, in line with GAO recommendations, DOD worked with the Performance Accountability Council to issue a strategic framework that the council included in its 2010 report to the President. The strategic framework identified key governmentwide reform goals and identified the root causes for timeliness delays and delays to agencies honoring reciprocity. It also set forth a governmentwide mission, performance measures, a communications strategy, roles and responsibilities, and metrics to measure the quality of security clearance investigations and adjudications. DOD continues to work with the Performance Accountability Council to sustain clearance reform efforts and enhance transparency and accountability through annual reporting to Congress.<sup>16</sup>

- DOD issued guidance on adjudication standards. In May 2009, we found that although DOD asserted that adjudicators follow a risk-management approach for granting security clearances, DOD had not issued formal guidance clarifying if and under what circumstances adjudicators can adjudicate incomplete investigative reports—such as missing information relevant to residences, employment, or education. As a result, we recommended that DOD issue guidance that clarifies when adjudicators may use incomplete investigative reports as the basis for granting clearances. Subsequently, on November 8, 2009, the Under Secretary of Defense for Intelligence issued guidance on adjudication standards that outline the minimum documentation requirements adjudicators must adhere to when documenting personnel security clearance determinations for cases with potentially damaging information. On March 10, 2010, the Under Secretary of

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<sup>16</sup> Annual reports were required under IRTPA through 2011. Section 367 of the Intelligence Authorization Act for Fiscal Year 2010, Pub. L. No. 111-259 (2010), established new annual reporting requirements in section 506H of the National Security Act of 1947 (50 U.S.C. § 415a-10).

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Defense for Intelligence issued additional guidance that clarifies when adjudicators may use incomplete investigative reports as the basis for granting clearances. This guidance provides standards that can be used for the sufficient explanation of incomplete investigative reports. Further, according to DOD officials, in 2010, DOD created a Performance Accountability Directorate within the Directorate of Security to provide oversight and accountability for the DOD Central Adjudication Facilities that process DOD adjudicative decisions.

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### DOD Developed Assessment Tools and Performance Metrics and Improved Timeliness to Demonstrate Progress

One of DOD's key actions that led to the removal of its personnel security clearance program from our high-risk list was that DOD was able to demonstrate its progress in having implemented corrective measures. Longstanding backlogs and delays in the clearance process led to our initial designation of this area as high risk. For example, in 2004, we testified that from fiscal year 2001 through fiscal year 2003, the average time for DOD to determine clearance eligibility for industry personnel increased by 56 days to over 1 year.<sup>17</sup> In 2005, we reported that DOD could not estimate the full size of its backlog, but we identified over 350,000 cases exceeding established timeframes for determining eligibility.<sup>18</sup> Moreover, in 2007 and 2009, we reported that clearances continued to take longer than the timeliness goals prescribed in IRTPA.<sup>19</sup> In 2011, we reported that DOD processed 90 percent of initial clearances in an average of 49 days for federal civilians, military, and industry

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<sup>17</sup> GAO, *DOD Personnel Clearances: Preliminary Observations Related to Backlogs and Delays in Determining Security Clearance Eligibility for Industry Personnel*, [GAO-04-202T](#) (Washington, D.C.: May 6, 2004).

<sup>18</sup> High-Risk Series: An Update. GAO-05-207. Washington, D.C.: January 2005.

<sup>19</sup> IRTPA required agencies to make a determination of eligibility for a clearance on at least 80 percent of all applications within an average of 120 days after the date of receipt of the application, with a maximum of 90 days allotted for the investigation and a maximum of 30 days allotted for the adjudication by no later than December 17, 2006. We found that clearances in 2007 for DOD industry personnel took an average of 325 days to complete. We also found that the application-submission phase averaged 111 days for industry personnel seeking initial top secret clearances, but the government goal is 14 days. In the investigation phase, we found that it took an average of 286 days for initial clearances—compared with the goal of 180 days—and 419 days for clearances updates for the 2,259 industry personnel who were granted clearance eligibility in January and February 2006. GAO, *High-Risk Series: An Update*, [GAO-07-310](#) (Washington, D.C.: January 2007). In our 2009 high-risk update, [GAO-09-271](#), we noted that DOD made significant progress toward meeting statutory timeliness goals for initial clearances. In December 2008, we reported that a sample of initial DOD clearances completed in fiscal year 2008 took an average of 87 days.

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personnel and met the 60-day statutory timeliness objective for processing all initial clearances in fiscal year 2010. Also we found that DOD completed 90 percent of initial clearances for industry personnel in an average of 63 days for all the data we reviewed in fiscal year 2010,<sup>20</sup> demonstrating an improvement from what we found in 2004, when the average processing time for industry personnel was over a year.

Our high-risk designation was based not only on problems with timeliness but also incomplete documentation of investigations and adjudications. We reported on missing documentation in investigative reports prepared by OPM that DOD adjudicators had used to make clearance eligibility decisions. In 2009, we estimated that 87 percent of about 3,500 OPM investigative reports provided to DOD in July 2008 were missing required documentation, which in most cases pertained to residences, employment, and education. DOD adjudicators granted clearance eligibility without requesting missing investigative information or fully documenting unresolved issues in 22 percent of DOD's adjudicative files. These findings led us to recommend that OPM and DOD, among other things, develop and report metrics on completeness and other measures of quality for investigations and adjudications that address the effectiveness of the new procedures. DOD agreed and implemented our recommendations regarding adjudication. OPM neither concurred nor nonconcurred with our recommendation; however, as noted earlier, OPM has taken steps to develop metrics.

Subsequently, DOD developed two quality tools to evaluate completeness of documentation used to determine clearance eligibility. First, the Rapid Assessment of Incomplete Security Evaluations (RAISE) tracks the quality of investigations conducted by OPM. Results of RAISE will be reported to the Director of National Intelligence, which, as the Security Executive Agent of the Performance Accountability Council, will arbitrate any potential disagreements between OPM and DOD and clarify policy questions. DOD deployed RAISE to four Central Adjudication Facilities from July to October 2010 and planned to complete deployment to the remaining Central Adjudication Facilities by calendar year 2011. According to DOD officials, as of June 2012 this tool has been deployed to all of DOD's non-intelligence agencies adjudication facilities. Although the Joint Reform Team is considering using it in the future, it is not being

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<sup>20</sup> [GAO-11-278](#).

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used by other executive agencies. Second, in 2008 DOD developed the Review of Adjudication Documentation Accuracy and Rationales (RADAR), which tracks the quality of clearance adjudications. In 2009, the Under Secretary of Defense for Intelligence directed DOD Central Adjudication Facilities to provide adjudication case records to the Defense Personnel Research Center for analysis. According to DOD officials, the department plans to use results of the RADAR assessments to monitor Central Adjudication Facilities' compliance with documentation policies, communicate performance to the Central Adjudication Facilities, identify potential weaknesses and training needs, increase compliance, and establish trend data. DOD has completed a pilot program for the use of RADAR and began its implementation for the Army, Defense Industrial Security Clearance Office, and Navy Central Adjudication Facilities in September 2010. In addition to these assessment tools, in 2010 DOD, OMB, ODNI, and OPM developed 15 metrics that assess the timeliness and quality of investigations, adjudications, reciprocity, and automation. The quality metrics, in turn, can be used to gauge progress and assess the quality of the personnel security clearance process. These metrics represented positive developments that could contribute to greater visibility over the clearance process.

Having assessment tools and performance metrics in place is a critical initial step toward instituting a program to monitor and independently validate the effectiveness and sustainability of corrective measures. The combination of congressional reporting requirements, the strategic framework, and the development of quality metrics, will help ensure transparency throughout the reform effort. It is important not only to have metrics but to use them to guide implementation. By using metrics for timeliness, DOD was able to show progress over time that helped build momentum to reach the final goal.

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## Continuing Executive Branch Leadership and Management Attention May Enhance the Security Clearance Reform Efforts

DOD's security clearance reform effort aligned with our criteria for removal from the high-risk list in fiscal year 2011. However, security clearance reform extends beyond DOD throughout the executive branch. This is evidenced by the oversight structure, through the Performance Accountability Council, and broad executive branch participation in the reform effort. Building on the factors for reforming the security process that we have reported in the past, continued leadership and attention, such as continuing to monitor and update outcome-focused performance measures, seeking opportunities to enhance efficiency and managing costs, and ensuring a strong requirements determination process, may enhance the security clearance reform effort.<sup>21</sup>

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## Implementing, Monitoring, and Updating Outcome-Focused Performance Measures

DOD has developed tools to monitor quality as well as participated in the development and tracking of quality metrics for OPM's investigations and DOD's adjudications through the Performance Accountability Council. We view the development of quality metrics as a positive step towards creating greater visibility over the quality of the clearance process and identifying specific quantifiable targets linked to goals that can be measured objectively. Moreover, leaders and others need to use these metrics to gauge progress toward improvements. Further, the development of performance measures related to the security clearance process by the Performance Accountability Council aligns with our previous recommendation to develop outcome-focused performance measures to continually evaluate the progress of the reform effort.<sup>22</sup> We have also previously reported on the importance of continually assessing and evaluating programs as a good business practice, including evaluating metrics to help ensure that they are effective and updated when necessary.<sup>23</sup> As a result, it is important to sustain the momentum of the reform and that DOD and OPM complete implementation of the

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<sup>21</sup> GAO, *Personnel Clearances: Key Factors for Reforming the Security Clearance Process*, [GAO-08-776T](#) (Washington, D.C.: May 22, 2008).

<sup>22</sup> GAO, *Personnel Security Clearances: An Outcome-Focused Strategy Is Needed to Guide Implementation of the Reformed Clearance Process*, [GAO-09-488](#) (Washington, D.C.: May 19, 2009).

<sup>23</sup> GAO, *Standards for Internal Control in the Federal Government*, [GAO/AIMD-00-21.3.1](#) (Washington, D.C.: November 1999).



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quality tools and metrics so that the executive branch can demonstrate progress in improving the quality of investigations and adjudications.

Leaders of the reform effort have consistently stated that implementation of reform will be incremental, and therefore, it is important that the information necessary to capture performance is up-to-date. The Performance Accountability Council quality metrics were developed subsequent to the issuance of the 2010 Strategic Framework, which articulates the goals of the security and suitability process reform. As a result, the 2010 Strategic Framework did not include a detailed plan or guidance for the implementation of the quality metrics. Further, the May 31, 2010 memorandum in which the Performance Accountability Council detailed its metrics did not discuss how often the metrics will be reexamined for continuous improvement. Moreover, according to DOD, the tools and metrics to assess quality have not been fully implemented. For example, while DOD has implemented its RAISE tool for investigation quality, it is not being used by other executive branch agencies—including OPM, which conducts the investigations and would be the appropriate agency to take actions to improve investigation quality—although the Joint Reform Team is considering using it in the future. Without these tools and metrics the executive branch will be unable to demonstrate progress in improving quality.

Emphasis on quality in clearance processes should promote positive outcomes, including more reciprocity among agencies in accepting each others' clearances. Building quality throughout clearance processes is important, but government agencies have not paid the same attention to quality as they have to timeliness. The emphasis on timeliness is due in part to the requirements and objectives established in IRTPA regarding the speed with which clearances should be completed. Our work has repeatedly called for more emphasis on quality.

As previously noted, IRTPA required an annual report of progress and key measurements as to the timeliness of initial security clearances in February of each year from 2006 through 2011. It specifically required those reports to include the periods of time required for conducting investigations, adjudicating cases, and granting clearances. IRTPA required the executive branch to implement a plan by December 2009 in which, to the extent practical, 90 percent of initial clearances were completed within 60 days, on average. In its initial reports, the executive branch reported only on the average of the fastest 90 percent of clearances and excluded the slowest 10 percent. We previously reported that full visibility was limited by the absence of comprehensive reporting

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of initial clearance decisions timeliness.<sup>24</sup> Consistent with our recommendation, the executive branch began reporting on the remaining 10 percent in its 2010 and 2011 reports. However, the IRTPA requirement for the executive branch to annually report on its timeliness expired last year. More recently, in 2010, the Intelligence Authorization Act of 2010 established a new requirement<sup>25</sup> that the President annually report the total amount of time it takes to process certain security clearance determinations for the previous fiscal year for each element of the Intelligence Community.<sup>26</sup>

The Intelligence Authorization Act of 2010 requires, among other things, annual reports from the President to Congress that include the total number of active security clearances throughout the United States government, to include both government employees and contractors. Its timeliness reporting requirement, however, applies only to the elements of the Intelligence Community. Unlike the IRTPA reporting requirement, the requirement to submit these annual reports does not expire. Further, the Intelligence Authorization Act requires two additional one-time reports: first, a report to Congress by the President including metrics for adjudication quality, and second, a report to the congressional intelligence committees by the Inspector General of the Intelligence Community on reciprocity. The report containing metrics for adjudication quality summarizes prior information on developed tools and performance measures; however, it does not provide additional information on the implementation or update of the performance measures that were

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<sup>24</sup> GAO, *Personnel Clearances: Key Factors to Consider in Efforts to Reform Security Clearance Processes*. [GAO-08-352T](#). Washington, D.C.: February 27, 2008.

<sup>25</sup> Section 367 of the Intelligence Authorization Act for Fiscal Year 2010, Pub. L. No. 111-259 (2010), established new annual reporting requirements in section 506H of the National Security Act of 1947 (50 U.S.C. § 415a-10).

<sup>26</sup> The Intelligence Community comprises 17 components: the National Security Agency, National Geospatial-Intelligence Agency, National Reconnaissance Office, Defense Intelligence Agency, Army Intelligence, Navy Intelligence, Marine Corps Intelligence, Air Force Intelligence (Air Force Intelligence, Surveillance, and Reconnaissance), Office of the Director of National Intelligence, Central Intelligence Agency, Department of Homeland Security (Office of Intelligence and Analysis), Department of State (Bureau of Intelligence and Research), Department of the Treasury (Office of Intelligence and Analysis), Federal Bureau of Investigation (National Security Branch), Drug Enforcement Agency (Office of National Security Intelligence), U.S. Coast Guard (Intelligence and Criminal Investigations), and Department of Energy (Office of Intelligence and Counterintelligence).

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identified in the May 2010 memorandum on quality metrics. Additionally, according to an ODNI official, the report on reciprocity has not been provided, although these reports were required 180 days after the law was enacted on Oct 7, 2010.

The Intelligence Authorization Act of 2010 reporting requirement on reciprocity—an agency’s acceptance of a background investigation or clearance determination completed by any authorized investigative or adjudicative agency—is the first time the executive branch has been required to report on this information since the reform effort began. Further, in 2010 we reported that although there are no governmentwide metrics to comprehensively track when and why reciprocity is granted or denied, agency officials stated that they routinely take steps to honor previously granted security clearances.<sup>27</sup> We found that agencies do not consistently document the additional steps they have taken prior to granting a reciprocal clearance. For example, the Navy keeps electronic documentation, the Department of Energy and the Department of the Treasury keep paper documentation, and the Army and the Air Force do not maintain any documentation on the additional steps taken to accept a previously granted security clearance. Consequently, there is no consistent tracking of the amount of staff time spent on the additional actions that are taken to honor a previously granted security clearance.

In addition, agencies do not consistently and comprehensively track the extent to which reciprocity is granted. OPM has a metric to track reciprocity, but this metric captures limited information, such as numbers of requested and rejected investigations, but not the number of cases in which a previously granted security clearance was or was not honored. Similarly, the metrics proposed by the Performance Accountability Council do not track the extent to which reciprocity is or is not ultimately honored. For example, metrics proposed by the Performance Accountability Council, such as the number of duplicate requests for investigations, percentage of applications submitted electronically, number of electronic applications submitted by applicants but rejected by OPM as unacceptable because of missing information or forms, and percentage of fingerprint submissions determined to be “unclassifiable” by the Federal Bureau of Investigation, provide useful information but do not

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<sup>27</sup> GAO, *Personnel Security Clearances: Overall Progress Has Been Made to Reform the Governmentwide Security Clearance Process*, [GAO-11-232T](#) (Washington, D.C.: Dec. 1, 2010).

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track the extent to which reciprocity is or is not ultimately honored. Without comprehensive, standardized metrics to track reciprocity, and documentation of the process, decision makers lack a complete picture of the extent to which reciprocity is granted and the challenges to honoring previously granted security clearances.

To further improve governmentwide reciprocity, in 2010 we recommended that the Deputy Director of Management, OMB, in the capacity as Chair of the Performance Accountability Council, develop comprehensive metrics to track reciprocity and then report the findings from the expanded tracking to Congress.<sup>28</sup> OMB generally concurred with our recommendation, stating that the Performance Accountability Council is working to develop these additional metrics. According to a 2011 report on security clearance performance metrics, the executive branch is making progress toward developing metrics to track reciprocity specifically with the intelligence community agencies.<sup>29</sup> We are encouraged by the Performance Accountability Council's development of quality metrics, which include some metrics for tracking reciprocity. These are positive steps that can contribute to greater visibility of the clearance process, but these measures have not yet been fully implemented or their effectiveness assessed.

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## Enhancing Efficiencies and Managing Costs

Our previous work has highlighted the importance of the executive branch enhancing efficiency and managing costs related to the reform effort. For example, in 2008, we noted that one of the key factors to consider in current and future reform efforts was the long-term funding requirements.<sup>30</sup> Further, in 2009, we found that reform-related reports did not detail what reform objectives require funding, how much they will cost, or where funding will come from.<sup>31</sup> Furthermore, the reports did not

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<sup>28</sup> GAO, *Personnel Security Clearances: Progress Has Been Made to Improve Timeliness but Continued Oversight Is Needed to Sustain Momentum*, [GAO-11-65](#) (Washington, D.C.: November 19, 2010).

<sup>29</sup> Office of the Director of National Intelligence, *2011 Report on Metrics for Security Clearance Adjudication Quality* (January 17, 2012).

<sup>30</sup> GAO, *DOD Personnel Clearance: Improved Annual Reporting Would Enable More Informed Congressional Oversight*, [GAO-08-350](#) (Washington, D.C.: February 13, 2008).

<sup>31</sup> GAO, *Personnel Security Clearances: An Outcome-Focused Strategy Is Needed to Guide Implementation of the Reformed Clearance Process*, [GAO-09-488](#) (Washington, D.C.: May 19, 2009).

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estimate potential cost savings resulting from the streamlined process. At that time, senior reform leaders stated that cost estimates had not been completed by the Joint Reform Team or the agencies affected by reform as it was too early. Accordingly, we recommended that reform leaders issue a strategic framework that contained the long-term funding requirements of reform, among other things. Consequently, in February 2010, the Performance Accountability Council issued a strategic framework that responded to our recommendation; however, that framework did not detail funding requirements. Instead, it noted that DOD and OPM would cover costs for major information technology acquisitions.

As reform leaders, through the Performance Accountability Council, consider changes to the current clearance processes, they should ensure that Congress is provided with the long-term funding requirements necessary to implement any such reforms. Those funding requirements to implement changes to security clearance processes are necessary to enable the executive branch to compare and prioritize alternative proposals for reforming the clearance processes. For example, DOD officials told us that it was unable to conduct quality assessment of adjudications during fiscal year 2011 due to lack of funding. In addition, DOD officials noted that the department is using its tool to assess the quality of investigations. However, there is no evidence that this tool is being used by other agencies to assess the quality of investigations. Given current fiscal constraints, identifying the long-term costs is critical for decision-makers to compare and prioritize alternative proposals for completing the transformation of the security clearance process. Without information on longer-term funding requirements necessary to implement the reform effort, Congress lacks the visibility it needs to fully assess appropriations requirements. We most recently reported on two areas of opportunity for which the executive branch may be able to identify efficiencies: information technology and investigation and adjudication case management and processes.<sup>32</sup>

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<sup>32</sup> GAO, *Background Investigations: The Office of Personnel Management Needs to Improve Transparency of Its Pricing and Seek Cost Savings*, [GAO-12-197](#) (Washington, D.C.: Feb. 2012).

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## Information Technology Is a Primary Cost Driver in the Security Clearance Process

In February 2012, we reported that information technology investments were one of OPM's background investigations programs' three main cost drivers.<sup>33</sup> While these investments represent less than 10 percent of OPM's fiscal year 2011 reported costs, they have increased more than 682 percent over 6 years (in fiscal year 2011 dollars), from about \$12 million in fiscal year 2005 to over \$91 million in fiscal year 2011.<sup>34</sup> Moreover, we reported that OPM's investigation process reverts its electronically-based investigation back into paper-based files. In November 2010, the Deputy Director for Management of the Office of Management and Budget testified that OPM now receives over 98 percent of investigation applications electronically, yet we observed that it is continuing to use a paper-based investigation processing system and converts electronically submitted applications to paper. OPM officials stated that the paper-based process is required because a small portion of their customer agencies do not have electronic capabilities. Furthermore, OPM's process has not been studied to identify efficiencies. As a result, OPM may be simultaneously investing in process streamlining technology while maintaining a less-efficient and duplicative paper-based process. We recommended that OPM take actions to identify process efficiencies, including its use of information technology to complete investigations, which could lead to cost savings within its background investigation processes. OPM concurred with our recommendation and commented that these actions also reinforce a Federal Investigative Services priority and that the agency will continue to map its process to achieve maximum process efficiencies and identify potential cost savings. In commenting on our final report, OPM stated in a May 25, 2012 letter to us that it is taking a number of actions that could lead to cost savings within its background investigation process. For example, OPM noted it is conducting a study of business processes identifying time savings and efficiencies for future Federal Investigative Services' business processes which will conclude by December 2013.

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<sup>33</sup> [GAO-12-197](#).

<sup>34</sup> For fiscal years 2005 to 2007, information technology costs were primarily for the operation and maintenance of OPM's information technology for processing background investigations; after fiscal year 2008 and beyond, according to officials information technology costs increased as a result of Federal Investigative Services' modernization effort, known as EPIC modernization.

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Case Management and  
Adjudication Process  
Efficiencies Could  
Reduce Duplication

In February 2012, as part of our annual report on opportunities to reduce duplication, overlap and fragmentation, we reported that multiple agencies have invested in or are beginning to invest in potentially duplicative, electronic case management and adjudication systems despite governmentwide reform effort goals that agencies leverage existing technologies to reduce duplication and enhance reciprocity.<sup>35</sup> According to DOD officials, DOD began the development of its Case Adjudication Tracking System in 2006 and, as of 2011, invested a total of \$32 million to deploy the system. The system helped DOD achieve efficiencies with case management and an electronic adjudication module for secret level cases that did not contain issues, given the volume and types of adjudications performed. According to DOD officials, after it observed that the Case Adjudication Tracking System could easily be deployed to other agencies at a low cost, the department intended to share the technology with interested entities across the federal government. For example, the Department of Energy is piloting the electronic adjudication module of DOD's system, and, according to DOD officials, the Social Security Administration is also considering adopting the system. In addition to DOD, Department of Justice officials said they began developing a similar system in 2007 at a cost of approximately \$15 million. In an effort to better manage the adjudication portion of the suitability and security clearance process, agencies have transitioned or plan to transition from a paper-based to an electronic adjudication case-management system. Although the investment in electronic case-management systems will likely lead to process efficiencies, agencies may not be leveraging adjudication technologies in place at other executive branch agencies to minimize duplication.

Five other agencies are also developing or seeking funds to develop systems with similar capabilities.<sup>36</sup> With multiple agencies developing individual case-management systems, these agencies may be at risk of duplicating efforts and may fail to realize cost savings. DOD officials suggested that opportunities may exist to leverage their case-management technology. However, DOD officials explained that agencies

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<sup>35</sup> GAO, *2012 Annual Report: Opportunities to Reduce Duplication, Overlap and Fragmentation, Achieve Savings, and Enhance Revenue*, [GAO-12-342SP](#) (Washington, D.C.: Feb. 28, 2012).

<sup>36</sup> One of these other agencies, the National Reconnaissance Office, is itself a component of DOD.



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would have to initially invest approximately \$300,000 for implementation, plus any needed expenditures related to customizations, and long-term support and maintenance, which could require approximately \$100,000 per year.

Officials from OPM, one of the five other agencies developing or seeking funds to develop similar systems, explained that they plan to develop an electronic case-management system that is synchronized with its governmentwide background investigations system that would be available for their customer agencies to purchase. OPM released a request for information to evaluate the options for this system. DOD responded to OPM's request for information by performing a comparative analysis of its own case-management system and said that it believes its system meets the needs set out in OPM's request for information. However, OPM officials said that DOD's system would cost too much money for smaller agencies to adopt, so OPM plans to continue exploring other options that would allow customer agencies access to their electronic case-management system without the need to make an expensive initial investment. Additionally, OPM officials said that their effort is intended to promote process efficiency by further integrating OPM with its more than 100 customer agencies. However, some OPM customer agencies, including DOD, which makes up approximately 75 percent of OPM's investigation workload, expressed concern that such a system would likely be redundant to currently available case-management technology. Further, any overhead costs related to the development of an OPM system would be incorporated into OPM's operating costs, which could affect investigation prices.

The investment in electronic case-management systems aligns with the reform effort's goal to automate information technology capabilities to improve the timeliness, efficiency, and quality of existing security clearance and suitability determinations systems. It also will likely lead to process efficiencies; however, agencies may be unclear how they might achieve cost savings through leveraging adjudication technologies in place at other executive branch agencies. In its March 2009 Enterprise Information Technology Strategy, the Joint Reform Team stated that agencies will leverage existing systems to reduce duplication and enhance reciprocity. Moreover, the Performance Accountability Council is positioned to promote coordination and standardization related to the suitability and security clearance process through issuing guidance to the agencies. The reform effort's strategic framework includes cost savings in its mission statement, but this framework lacks specificity regarding how agencies might achieve costs savings. Without specific guidance, the

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opportunities to minimize duplication and achieve cost savings may be lost. Therefore, in 2012 we recommended that OMB as the Chair of the Performance Accountability Council expand and specify reform-related guidance to help ensure that reform stakeholders identify opportunities for cost savings, such as preventing duplication in the development of electronic case management. OMB concurred with our recommendation.<sup>37</sup>

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### A Sound Requirements Process for Determining Required Clearances and Level of Clearances May Reduce Costs

In February 2008 and in subsequent reports, we have noted the importance of having a sound requirements determination process for security clearances. Specifically, a sound requirements determination process may help ensure that workload and costs are not higher than necessary. Further, the Performance Accountability Council's reformed security clearance process identified determining if a position requires a security clearance as the first step of the process. Specifically, the clearance process begins with establishing whether a position requires a clearance, and if so, at what level. The numbers of requests for initial and renewal clearances and the levels of such clearance requests are two ways to look at outcomes of requirements setting in the clearance process. As of October 2010, the Director of National Intelligence reported that 3.9 million<sup>38</sup> federal employees (military and civilian) and contractors hold security clearances. Moreover, OPM reported that its cost to conduct background investigations for much of the executive branch outside the intelligence agencies increased about 79 percent from about \$602 million in fiscal year 2005 to over \$1.1 billion in fiscal year 2011.

In our prior work, DOD personnel, investigations contractors, and industry officials told us that the large number of requests for investigations could be attributed to many factors. For example, they ascribed the large number of requests to the heightened security concerns that resulted from the September 11, 2001, terrorist attacks. They also attributed the large number of investigations to an increase in the operations and deployments of military personnel and to the increasingly sensitive technology that military personnel, government employees, and contractors come in contact with as part of their jobs. Having a large number of cleared personnel can give the military services, agencies, and

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<sup>37</sup> [GAO-12-197](#).

<sup>38</sup> These are the latest available data.

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industry a great deal of flexibility when assigning personnel, but the investigative and adjudicative workloads that are required to provide clearances and that flexibility further tax the clearance process.

A change in the higher level of clearances being requested also increases the investigative and adjudicative workloads. For example, top secret clearances must be renewed twice as often as secret clearances (i.e., every 5 years versus every 10 years). More specifically, the average investigative report for a top secret clearance takes about 10 times as many investigative staff hours as the average investigative report for a secret clearance. As a result, the investigative workload increases about 20-fold. Additionally, the adjudicative workload increases about 4-fold, because in our previous work, DOD officials estimated that investigative reports for a top secret clearance took about twice as long to review as an investigative report for a secret clearance. Further, a top secret clearance needs to be renewed twice as often as the secret clearance. In August 2006, OPM estimated that approximately 60 total staff hours are needed for each investigation for an initial top secret clearance and 6 total staff hours are needed for the investigation to support a secret or confidential clearance. The doubling of the frequency along with the increased effort to investigate and adjudicate each top secret reinvestigation adds costs and workload for the government.

For fiscal year 2012, OPM's standard base prices are \$4,005 for an investigation for an initial top secret clearance; \$2,711 for an investigation to renew a top secret clearance, and either \$228 or \$260 for an investigation for a secret clearance.<sup>39</sup> As we reported in February 2012, these base prices can increase if triggered by the circumstances of a case, such as issues related to credit or criminal history checks. For example, in 2011, DOD officials stated that the prices contained in OPM's Federal Investigative Notices are not always reflective of the amount DOD actually pays for an investigation, as a result of these circumstances. Further, the cost of getting and maintaining a top secret clearance for 10 years is almost 30 times greater than the cost of getting and maintaining a secret clearance for the same period. For example, an individual getting a top secret clearance for the first time and keeping the clearance for 10 years would cost the government a total of \$6,716 in current year dollars (\$4,005 for the initial investigation and \$2,711 for the

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<sup>39</sup> These billing rates are published in OPM's annual Federal Investigative Notices.

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reinvestigation after the first 5 years). In contrast, an individual receiving a secret clearance and maintaining it for 10 years would result in a total cost to the government of \$228 (\$228 for the initial clearance that is good for 10 years). Requesting a clearance for a position in which it will not be needed, or in which a lower level clearance would be sufficient, will increase investigative workload and thereby costs unnecessarily. We are currently reviewing the process that the executive branch uses to determine whether a position requires a security clearance for the Ranking Member of the House Committee on Homeland Security, and the expected issuance date for this report is this summer.

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In conclusion, Mr. Chairman, Mr. Johnson, and Members of the Subcommittee, as evidenced by our removal of the DOD's security clearance program from our high-risk list, we are strongly encouraged by the progress that the Performance Accountability Council, and in particular, DOD, has made over the last few years. DOD has shown progress by implementing recommendations, improving overall timeliness, and taking steps to integrate quality into its processes. The progress that has been made with respect to the overall governmentwide reform efforts would not be possible without committed and sustained leadership of Congress and by the senior leaders involved in the Performance Accountability Council as well as their dedicated staff. Continued oversight and stewardship of the reform efforts is the cornerstone to sustaining momentum and making future progress. As the executive branch continues to move forward to enhance the suitability and security clearance reform, the actions to monitor quality and enhance efficiency will be key to enhance the progress made on timeliness to date.

Chairman Akaka, Ranking Member Johnson, and Members of the Subcommittee, this concludes my prepared statement, and I would be pleased to answer any questions that you may have. Thank you.

For further information on this testimony, please contact Brenda S. Farrell, Director, Defense Capabilities and Management, who may be reached at (202) 512-3604. Contact points for our Congressional Relations and Public Affairs offices may be found on the last page of this statement. GAO staff who made key contributions to this testimony include Lori Atkinson (Assistant Director), Grace Coleman, Sara Cradic, James Krustapentus, Gregory Marchand, Jillena Roberts, and Amie Steele.

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